

Honorable Ronald B. Leighton

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

LYNN ANN HUST,

Plaintiff,

v.

No. C08-5501 RBL

(1) The State of Wyoming;  
(2) The State of Washington;  
(3) Dave Freudenthal, Governor of the  
State of Wyoming;  
(4) Christine O. Gregoire, Governor of  
the State of Washington;  
(5) Richard C. Bohling, Prosecuting  
Attorney for Albany County, State  
of Wyoming;  
(6) Gwendolyn K. Smith, Police Officer,  
Laramie Police Department, City of  
Laramie, State of Wyoming;  
(7) A. Joe Hageman, Attorney and City  
Council Member, City of Laramie,  
State of Wyoming;  
(8) City Council. The City of Laramie.  
County of Albany, State of Wyoming;  
(9) County Board of Commissioners,  
The County of Albany, State of  
Wyoming;  
(10) Second Judicial Circuit Court,  
County of Albany. State of Wyoming;  
(11) Laramie Police Department, City  
of Laramie, Wyoming;  
(12) Albany County Sheriffs

DECLARATION OF  
BERNARD F. VELJACIC  
IN SUPPORT OF  
MOTION TO STAY DISCOVERY  
BY CLARK COUNTY AND BATTLE  
GROUND DEFENDANTS

Department, County of Albany, State  
of Wyoming;  
(13) Battle Ground Police Department,  
City of Battle Ground, State of  
Washington;  
(14) Clark County Sheriff's  
Department, County of Clark, State of  
Washington;  
(15) Office of the Clark County  
Prosecuting Attorney, County of Clark,  
State of Washington;  
(16) District Court, County of Clark,  
State of Washington;  
(17) Superior Court, County of Clark,  
State of Washington;  
(18) County Board of Commissioners,  
County of Clark, State of Washington;  
(19) City Council, The City of Battle  
Ground, State of Washington;  
(20) Washington State Patrol, State of  
Washington;  
(21) Laramie Plains Community  
Federal Credit Union;  
(22) Laramie Boomerang;  
(23) Casper Star-Tribune, Casper,  
Wyoming;  
(24) News Corporation;  
(25) Media News Group;  
(26) The Associated Press;  
(27) Arthur David Curtis, Prosecutor,  
Clark County, Washington;  
(28) Doe One Battle Ground Police  
Arresting Officer, May 1, 2006;  
(29) Doe Two Battle Ground Police  
Arresting Officer, May 1, 2006;  
(30) Doe Three Battle Ground Police  
Arresting Officer, June 13, 2006;  
(31) Doe Four Battle Ground Police  
Arresting Officer, June 13, 2006,  
Defendants.

Defendants.

1. The undersigned is of counsel for the Clark County Defendants.
2. In that capacity, your declarant has reviewed and answered the complaint in the above-captioned action.
3. The facts set forth in the defendants' motion for stay of discovery are true according to the information and belief of the undersigned declarant after a reasonable investigation thereof.
4. This declaration is made in Vancouver, Clark County, Washington.

DATED this 23rd day of October, 2008.

s/Bernard F. Veljacic, WSBA #28702  
Attorney for Defendants  
Clark County Prosecuting Attorney, Civil Division  
PO Box 5000  
Vancouver WA 98666-5000  
Telephone: (360) 397-2478  
Facsimile: (360) 397-2184  
[bernard.veljacic@clark.wa.gov](mailto:bernard.veljacic@clark.wa.gov)

### CERTIFICATE OF SERVICE

I, Thelma Kremer, hereby certify that on this 23rd day of October, 2008, I electronically filed the foregoing *Declaration of Bernard F. Veljacic* in support of *Motion to Stay Discovery by Clark County and Battle Ground Defendants* with the Clerk of the Court using the CM/ECF system, who will electronically send notice to the plaintiff.

s/Thelma Kremer  
Clark County Prosecutor's Office  
Civil Division